

FILED

DEC 6 2016

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
WHEELING, WV 26003

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No. 3:16-CR-50

STEVEN ROBINSON, a/k/a "H",
TERARD ANSOR,
BRITTANY BROOKS,
TIARA ADAMS,
STEPHANIE EDMONDS,
MARK HANSHAW,
BRANDI KERN,
JOSEPH KILLIAN,
BRANDON FRENCH,
AMANDA MARSHALL,
WAYNE KEGLEY,
GARFIELD MISSENIS,
MICHELLE ZIMMERMAN,
DONNA MILLER,
LARRY STINSON, JR.,
DANIELLE EY,
CHARLES WRIGHT, and
HOLLY HOPKINS

Violations: 18 U.S.C. § 2
18 U.S.C. § 1952(a)(3)
18 U.S.C. § 1956(h)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 843(b)
21 U.S.C. § 843(d)
21 U.S.C. § 846
21 U.S.C. § 853

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Distribute Heroin)

1. From on or about August 20, 2015 to on or about the date of the return of the Indictment, in Berkeley and Jefferson Counties, within the Northern Judicial District of West Virginia, and elsewhere, Defendants **STEVEN ROBINSON, a/k/a "H", TERARD ANSOR, BRITTANY BROOKS, TIARA ADAMS, STEPHANIE EDMONDS, MARK**

HANSHAW, BRANDI KERN, JOSEPH KILLIAN, BRANDON FRENCH, AMANDA MARSHALL, WAYNE KEGLEY, GARFIELD MISSENIS, MICHELLE ZIMMERMAN, DONNA MILLER, LARRY STINSON, JR., DANIELLE EY, CHARLES WRIGHT, and HOLLY HOPKINS did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding together with each other, and with persons known and unknown to the Grand Jury to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute, and to distribute, at least one kilogram of heroin, a Schedule I controlled substance.

MANNER AND MEANS OF THE CONSPIRACY

2. The primary purpose of the conspiracy was to profit economically from the trafficking of heroin throughout the Northern District of West Virginia and elsewhere through the manner and means described below.

3. It was part of the conspiracy that members would undertake different roles and tasks, which included distributor, redistributor, and courier of heroin and currency.

4. It was further part of the conspiracy that co-conspirators would obtain heroin from Defendants **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR** in and around Baltimore, Maryland, and thereafter distribute that heroin in the Northern District of West Virginia, deriving substantial gross receipts from their unlawful enterprise.

5. As part of the conspiracy, co-conspirators would routinely travel to Maryland from the Northern District of West Virginia to obtain heroin from Defendants **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR**. During these trips, individuals would give **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR** cash or other substances

in exchange for heroin. These co-conspirators would then return to the Northern District of West Virginia to redistribute the heroin.

6. Defendant **BRITTANY BROOKS** would rent vehicles for Defendant **STEVEN ROBINSON, a/k/a "H"**, for use in their unlawful enterprise.

7. Defendant **TIARA ADAMS** would collect currency derived from their unlawful enterprise and deposit that currency into various accounts.

8. Defendant **STEVEN ROBINSON, a/k/a "H"**, controlled and managed the organization. Co-conspirators would communicate with Defendants **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR** by telephone. Co-conspirators would advise Defendants **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR** that the co-conspirator was interested in purchasing heroin. Co-conspirators would advise Defendants **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR** by telephone when they reached the intersection of Interstate 70 and Interstate 695. Defendants **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR** would provide co-conspirators with directions to a location to complete the transaction.

9. On March 11, 2016, co-conspirators Larry Stinson, Jr., and Danielle Ey brought approximately 19.9 grams of heroin into the Northern District of West Virginia after purchasing that heroin from Defendants **STEVEN ROBINSON, a/k/a "H."**

10. On June 6, 2016, co-conspirators Garfield Missenis and Michelle Zimmerman brought approximately 59 grams of heroin into the Northern District of West Virginia after purchasing that heroin from Defendants **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR**.

11. On June 23, 2016, co-conspirators Wayne Kegley and Donna Miller brought approximately 39.7 grams of heroin into the Northern District of West Virginia after purchasing that heroin from Defendants **STEVEN ROBINSON, a/k/a "H"**, and/or **TERARD ANSOR**.

12. As part of the conspiracy, Defendants and others distributed in excess of one kilogram of heroin, with an illegal street value in excess of \$300,000.

OVERT ACTS

13. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following over acts, among others, were committed in the Northern District of West Virginia and elsewhere:

- a. On or about August 20, 2015, **TERARD ANSOR** distributed a quantity of heroin to a person known to the Grand Jury for \$360.
- b. On or about November 4, 2015, **TERARD ANSOR** distributed a quantity of heroin to a person known to the Grand Jury for \$300.
- c. On or about December 10, 2015, **STEVEN ROBINSON, a/k/a "H"**, distributed a quantity of heroin to a person known to the Grand Jury for \$3,000.
- d. On or about March 11, 2016, **STEVEN ROBINSON, a/k/a "H"**, possessed a distribution quantity of heroin.
- e. On or about March 15, 2016, Defendant **GARFIELD MISSENIS** distributed heroin to a person known to the Grand Jury for \$100.

- f. On or about April 20, 2016, **STEVEN ROBINSON, a/k/a "H"**, distributed a quantity of heroin to a person known to the Grand Jury for \$400.
- g. On or about June 6, 2016, **STEVEN ROBINSON, a/k/a "H"**, possessed a distribution quantity of heroin.
- h. On or about May 16, 2016, Defendant **GARFIELD MISSENIS** distributed heroin to a person known to the Grand Jury for a PlayStation.
- i. On or about June 6, 2016, Defendants **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, possessed a distribution quantity of heroin.
- j. On or about June 23, 2016, **STEVEN ROBINSON, a/k/a "H"**, possessed a distribution quantity of heroin.
- k. On or about June 23, 2016, Defendants **WAYNE KEGLEY** and **DONNA MILLER**, possessed a distribution quantity of heroin.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

COUNT TWO

(Travel Act – Promotion)

1. On or about December 10, 2015, in Berkeley County, in the Northern District of West Virginia, and elsewhere Defendant, **STEVEN ROBINSON**, did cause a person known to the Grand Jury to travel in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about December 10, 2015, Defendant, **STEVEN ROBINSON**, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, involving the Controlled Substances Act offense charged in Count One of this Indictment, that is, the Defendant, **STEVEN ROBINSON**, distributed a quantity of heroin, in exchange for \$3,000 in United States Currency; in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT THREE

(Unlawful Use of Communication Facility)

On or about March 7, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, **LARRY STINSON, JR.**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, **LARRY STINSON, JR.**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT FOUR

(Interstate Travel in Aid of Racketeering)

1. On or about March 7, 2016, Defendant, **LARRY STINSON, JR.**, traveled in interstate commerce between the States of Maryland and West Virginia with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about March 7, 2016, in Berkeley County, in the Northern District of West Virginia, Defendant, **LARRY STINSON, JR.**, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendant, **LARRY STINSON, JR.**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT FIVE

(Unlawful Use of Communication Facility)

On or about March 9, 2016 in Berkeley County, in the Northern District of West Virginia, Defendant **GARFIELD MISSENIS** did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, **GARFIELD MISSENIS**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT SIX

(Unlawful Use of Communication Facility)

On or about March 9, 2016 in Berkeley County, in the Northern District of West Virginia, Defendant **MICHELLE ZIMMERMAN** did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant **MICHELLE ZIMMERMAN** used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT SEVEN

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

1. On or about March 9, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, aided and abetted by each other, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about March 9, 2016, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, aided and abetted by each other did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT EIGHT

(Unlawful Use of Communication Facility)

On or about March 10, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, **CHARLES WRIGHT**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, **CHARLES WRIGHT**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT NINE

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

1. On or about March 10, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **CHARLES WRIGHT** and **HOLLY HOPKINS**, aided and abetted by each other, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about March 10, 2016, Defendants, **CHARLES WRIGHT** and **HOLLY HOPKINS**, aided and abetted by each other did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **CHARLES WRIGHT** and **HOLLY HOPKINS**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT TEN

(Unlawful Use of Communication Facility)

On or about March 11, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, **LARRY STINSON, JR.**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count Three of this Indictment, that is Defendant, **LARRY STINSON, JR.**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT ELEVEN

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

1. On or about March 11, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **LARRY STINSON, JR.** and **DANIELLE EY**, aided and abetted by each other, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about March 11, 2016, Defendants, **LARRY STINSON, JR.** and **DANIELLE EY**, aided and abetted by each other did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **LARRY STINSON, JR.** and **DANIELLE EY**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT TWELVE

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about March 11, 2016, in Berkeley County, West Virginia, within the Northern District of West Virginia, and elsewhere, Defendants, **STEVEN ROBINSON, a/k/a "H", LARRY STINSON, JR., and DANIELLE EY**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

(Distribution of Heroin)

On or about March 15, 2016, in Berkeley County, in the Northern District of West Virginia, Defendant, **GARFIELD MISSENIS**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance, to a person known to the Grand Jury, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

(Unlawful Use of Communication Facility)

On or about April 18, 2016, in Jefferson County, West Virginia, in the Northern District of West Virginia, and elsewhere, Defendant, **JOSEPH KILLIAN**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, **JOSEPH KILLIAN**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT FIFTEEN

(Interstate Travel in Aid of Racketeering)

1. On or about April 18, 2016, in Jefferson County, in the Northern District of West Virginia, Defendant, **JOSEPH KILLIAN**, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about April 18, 2016, Defendant, **JOSEPH KILLIAN**, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendant, **JOSEPH KILLIAN**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT SIXTEEN

(Travel Act – Promotion)

1. On or about April 20, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere Defendant, **STEVEN ROBINSON**, did cause a person known to the Grand Jury to travel in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about April 20, 2016, Defendant, **STEVEN ROBINSON**, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, involving the Controlled Substances Act offense charged in Count One of this Indictment, that is, the Defendant, **STEVEN ROBINSON**, distributed a quantity of heroin, in exchange for \$400 in United States Currency; in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT SEVENTEEN

(Unlawful Use of Communication Facility)

On or about April 28, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, **CHARLES WRIGHT**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count Three of this Indictment, that is Defendant, **CHARLES WRIGHT**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT EIGHTEEN

(Interstate Travel in Aid of Racketeering)

1. On or about April 28, 2016, in Berkeley County, in the Northern District of West Virginia, Defendant, **CHARLES WRIGHT**, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about April 28, 2016, Defendant, **CHARLES WRIGHT**, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendant, **CHARLES WRIGHT**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT NINETEEN

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

1. On or about May 4, 2016, in Jefferson County, in the Northern District of West Virginia, Defendants, **JOSEPH KILLIAN** and **BRANDON FRENCH**, aided and abetted by each other, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about May 4, 2016, Defendants, **JOSEPH KILLIAN** and **BRANDON FRENCH**, aided and abetted by each other did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **JOSEPH KILLIAN** and **BRANDON FRENCH**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT TWENTY

(Distribution of Heroin)

On or about May 16, 2016, in Berkeley County, in the Northern District of West Virginia, Defendant, **GARFIELD MISSENIS**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance, to a person known to the Grand Jury, in exchange for a PlayStation; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

(Unlawful Use of Communication Facility)

On or about May 30, 2016, in Jefferson County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, **BRANDI KERN**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, **BRANDI KERN**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY-TWO

(Unlawful Use of Communication Facility)

On or about June 6, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, Defendant, **GARFIELD MISSENIS**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count Seven of this Indictment, that is Defendant, **GARFIELD MISSENIS**, used a telephone to facilitate the distribution of heroin, the possession with intent to distribute heroin, and the conspiracy to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY-THREE

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

1. On or about June 6, 2016, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, aided and abetted by each other, traveled in interstate commerce between the States of Maryland and West Virginia with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about June 6, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, aided and abetted by each other, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT TWENTY-FOUR

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about June 6, 2016, in Berkeley County, West Virginia, within the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, **STEVEN ROBINSON, a/k/a "H", GARFIELD MISSENIS, and MICHELLE ZIMMERMAN** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

1. On or about June 23, 2016, Defendants, **WAYNE KEGLEY** and **DONNA MILLER**, aided and abetted by each other, traveled in interstate commerce between the States of Maryland and West Virginia with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.

2. Thereafter, on or about June 23, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **WAYNE KEGLEY** and **DONNA MILLER**, aided and abetted by each other, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **WAYNE KEGLEY** and **DONNA MILLER**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT TWENTY-SIX

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about June 23, 2016, in Berkeley County, West Virginia, within the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, **STEVEN ROBINSON, a/k/a "H", WAYNE KEGLEY, and DONNA MILLER**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about June 29, 2016, in Berkeley County, West Virginia, within the Northern District of West Virginia, and elsewhere, Defendants, **JOSEPH KILLIAN** and **AMANDA MARSHALL**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

(Conspiracy to Launder Monetary Instruments)

1. Paragraphs 1 through 13 alleged in Count One above are incorporated herein by reference as if repeated and re-alleged in full.

2. From on or about August 20, 2015, and continuing to on or about the date of the return of this indictment the Defendants **STEVEN ROBINSON, a/k/a "H", BRITTANY BROOKS**, and **TIARA ADAMS**, did knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to conduct unlawful financial and monetary transactions involving the proceeds of the conspiracy alleged in Count One in the Northern District of West Virginia and elsewhere, in violation of Title 18, United States Code, Sections 1956 and 1957.

OBJECTS OF THE CONSPIRACY

3. An object of the conspiracy was to violate Title 18, United States Code Section 1956(a)(1)(A)(i) by knowingly conducting financial transactions affecting interstate commerce involving proceeds of the specified unlawful activity constituting the offense charged in Count One, with the intent to promote the carrying on of such specified unlawful activity.

4. An object of the conspiracy was to violate Title 18, United States Code Section 1956(a)(1)(B)(i) by knowingly conducting financial transactions affecting interstate commerce involving the proceeds of the specified unlawful activity constituting the offense charged in Count One, knowing that the transactions would be designed to

conceal and disguise the nature, location, source, ownership, and control of proceeds of said specified unlawful activity.

5. An object of the conspiracy was to violate Title 18, United States Code Section § 1957 by knowingly engaging in monetary transactions through and to financial institutions, affecting interstate commerce, in criminally derived property of a value greater than \$10,000 that had been derived from the specified unlawful activity constituting the offense charged in Count One.

MANNER AND MEANS OF THE CONSPIRACY

6. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

7. It was part of the conspiracy that Defendant **STEVEN ROBINSON**, would cause and direct individuals to bring currency to him from the Northern District of West Virginia.

8. It was part of the conspiracy that Defendants **STEVEN ROBINSON**, **BRITTANY BROOKS**, and **TIARA ADAMS**, would use bank accounts and acquire assets such as real estate and vehicles, make payments on assets, and invest in businesses with currency derived from this illegal activity. Some of these businesses would then be used to launder the illegal proceeds. Some of these assets would then be used to further the specified unlawful activity constituting the offense charged in Count One. Some of the assets would then be placed in nominee names in order to conceal and disguise the nature, location, source, ownership, and control of the assets and proceeds of the specified unlawful activity constituting the offense charged in Count One.

9. It was further part of the conspiracy that Defendant **TIARA ADAMS** would deposit currency derived from the said specified unlawful activity constituting the offense charged in Count One into an account at PNC Bank.

10. It was further part of the conspiracy that co-conspirators would make deposit transactions of currency derived from the unlawful activity constituting the offense charged in Count One into an account at Bank of America opened in the name of PC Realty, LLC, and over which Defendants **STEVEN ROBINSON, a/k/a "H"**, and **TIARA ADAMS** have signature authority. The currency derived from the unlawful activity constituting the offense charged in Count One would then be used to acquire assets.

11. It was further part of the conspiracy that co-conspirators would make deposit transactions of currency derived from the unlawful activity constituting the offense charged in Count One into an account at Wells Fargo opened in the name of Empire Estates, LLC, an entity that Defendants **STEVEN ROBINSON, a/k/a "H"**, and **TIARA ADAMS** own.

12. It was further part of the conspiracy that **BRITTANY BROOKS** used currency derived from the unlawful activity constituting the offense charged in Count One to rent vehicles then used by Defendant **STEVEN ROBINSON, a/k/a "H"**, to promote the carrying on of the unlawful activity constituting the offense charged in Count One.

OVERT ACTS

13. In furtherance of the conspiracy, and to effect the objects thereof, a conspirator committed at least one of the following overt acts, and others:

14. On December 10, 2015, Defendant, **STEVEN ROBINSON**, caused an

individual known to the Grand Jury to travel from Berkeley County, West Virginia to Maryland with \$3,000 in United States Currency.

15. On or about January 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$3,000 into an account at PNC Bank.

16. On or about January 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,000 into an account at PNC Bank.

17. On or about January 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$600 into an account at PNC Bank.

18. On February 16, 2016, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC.

19. On or about February 29, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$5,000 into an account at PNC Bank.

20. On or about February 29, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$370.

21. On or about March 7, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$370 into an account at PNC Bank.

22. On or about March 7, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$20 into an account at PNC Bank.

23. On or about March 21, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$880 into an account at PNC Bank.

24. On or about March 7, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$220 into an account at PNC Bank.

25. On March 14, 2015, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC.

26. On April 4, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

27. On or about April 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$2,750 into an account at PNC Bank.

28. On or about April 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$60 into an account at PNC Bank.

29. On or about April 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$300 into an account at PNC Bank.

30. On or about April 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$100 into an account at PNC Bank.

31. On April 11, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

32. On April 15, 2016, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC.

33. On April 18, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

34. On or about April 18, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$300 into an account at PNC Bank.

35. On or about April 18, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$240 into an account at PNC Bank.

36. On April 20, 2016, Defendant, **STEVEN ROBINSON**, caused an individual known to the Grand Jury to travel from Berkeley County, West Virginia to Maryland with \$400 in United States Currency.

37. On April 25, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

38. On or about April 29, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$980 into an account at PNC Bank.

39. On or about April 29, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$220 into an account at PNC Bank.

40. On or about May 2, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$2,020 into an account at PNC Bank.

41. On or about May 2, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,000 into an account at PNC Bank.

42. On or about May 2, 2016, Defendant **TIARA ADAMS** made a second cash deposit of \$1,000 into an account at PNC Bank.

43. On or about May 2, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$820 into an account at PNC Bank.

44. On or about May 2, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$660 into an account at PNC Bank.

45. On May 16, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

46. On May 18, 2016, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC

47. On May 23, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

48. On June 1, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

49. On or about June 6, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$2,280 into an account at PNC Bank.

50. On or about June 6, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,870 into an account at PNC Bank.

51. On or about June 6, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$220 into an account at PNC Bank.

52. On June 9, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

53. On June 13, 2016, \$30,000 was received by wire transfer to an account at Bank of America opened in the name of PC Realty, LLC from Congressional Bank customer WWW Advantage Title, with instructions marked regarding BWS Holdings LLC.

54. On June 15, 2016, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC.

55. On June 16, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

56. On June 20, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

57. On or about June 22, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$300 into an account at PNC Bank.

58. On or about June 22, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$135 into an account at PNC Bank.

59. On June 27, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

60. On June 30, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

61. On or about July 5, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$3,100 into an account at PNC Bank.

62. On or about July 5, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$2,300 into an account at PNC Bank.

63. On or about July 5, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$100 into an account at PNC Bank.

64. On July 7, 2016 Defendant **BRITTANY BROOKS** used a Visa credit card to rent a vehicle from Alamo.

65. On July 14, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

66. On July 15, 2016, \$30,000 was received by wire transfer to an account at Bank of America opened in the name of PC Realty, LLC from Wells Fargo Bank NA customer Style Stage Salon, LLC.

67. On July 21, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

68. On July 28, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

69. On August 4, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

70. On or about August 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,060 into an account at PNC Bank.

71. On or about August 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,000 into an account at PNC Bank.

72. On or about August 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$340 into an account at PNC Bank.

73. On August 11, 2016 Defendant **BRITTANY BROOKS** used a Visa credit card to rent a vehicle from Alamo.

74. On August 19, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

75. On August 25, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

76. On September 1, 2016 Defendant **BRITTANY BROOKS** used a Visa credit card to rent a vehicle from Alamo.

77. On September 8, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

78. On September 12, 2015, \$5,000 was wire transferred from an account at Bank of America opened in the name of PC Realty, LLC to D.R. Horton – Crown Realty Professionals.

79. On September 15, 2016 Defendant **BRITTANY BROOKS** used a Visa credit card to rent a vehicle from Alamo.

80. On September 30, 2016, a \$30,000 cashier's check was drawn from an account at Bank of America opened in the name of PC Realty, LLC made payable to Capshaw Development.

81. On October 6, 2016, a \$3,500 cash deposit was made into an account at Bank of America opened in the name of PC Realty, LLC.

82. On October 6, 2016, \$75,000 was wire transferred from an account at Bank of America opened in the name of PC Realty, LLC to United Community Bank, Blairsville, GA, for the benefit of Welch, Webb & White.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

*Controlled Substances Act
Travel Act*

1. Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Sections 841 and 846, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including, but not limited to: (1) \$4,500.00 in United States Currency seized from Charles Wright on May 31, 2016; (2) \$2,241.00 in United States Currency and miscellaneous tools described in Attachment A, seized from the residence of Garfield Missenis, Wayne Kegley, Michelle Zimmerman, and Donna Miller on June 23, 2016; (3) \$2,099.00 in United States Currency seized from the residence of Joseph Killian on June 29, 2016; (4) all funds contained in Bank of America account number XXXXXXXX0983, held in the name of Tiara Adams; (5) all funds contained in Wells Fargo account number XXXXXX7241, held in the name of Empire Estates, LLC; (6) all funds contained in PNC Bank account number XXXXXX4194, held in the name of Tiara Adams; and (7) a money judgment in the amount of at least \$300,000.

2. Pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 981(a)(1)(C) , 1956(c)(7)(A), 1961(1), and Title 21, United States Code, Section 853, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code,

BRAND	MODEL	SERIAL/UPC	DESCRIPTION	NUMBER	LOCATION
BLACK & DECKER	FIRE STORM SAW	FS180BRS			BLACK FIRE STORM BAG
INTERTEK LIGHT			SHOP LIGHT		BLACK FIRE STORM BAG
RAFTSMAN			DRILL		BLACK FIRE STORM BAG
KIDDE	1335302	G0722	AUTO MARINE FIRE EXTINGUISHER		WHITE CARDBOARD BOX
BOSCH	FS18090		1 1/2" OIL PRESSURE/WATER TEMP		WHITE CARDBOARD BOX
BOSCH	FS18207		2" WATER/OIL TEMP GAUGE		WHITE CARDBOARD BOX
BOSCH	FS17906		2 5/8" TACHOMETER		WHITE CARDBOARD BOX
BOSCH	FS18206		2" OIL PRESSURE GAUGE		WHITE CARDBOARD BOX
BOSCH	FS17911		2 5/8" TACHOMETER		WHITE CARDBOARD BOX
BOSCH	FS18092		1 1/2" OIL PRESSURE/WATER OIL TEMP/VOLT		WHITE CARDBOARD BOX
HARLEY DAVIDSON	71682-06A		HORN SWITCH KIT		WHITE CARDBOARD BOX
HARLEY DAVIDSON	71684-06A		RUN/STOP/START SWITCH KIT		WHITE CARDBOARD BOX
WILEY K	AIRAGE LA		GREY GLASSES		WHITE CARDBOARD BOX
DEWALT	DW117	17141	MOTORCYCLE STATOR RING		WHITE CARDBOARD BOX
PITTSBURGH	DW117		1 1/2" DRILL		WHITE CARDBOARD BOX
SCHUMAKER	68790		1 1/2" PC WRENCH SET		WHITE CARDBOARD BOX
SONY		SWC1123	BATTERY CHARGER		WHITE CARDBOARD BOX
GEAR WRENCH		MB3278149560			WHITE CARDBOARD BOX
	PLAYSTATION 4 CUH1115A		PLAYSTATION CONTROLLERS	2	BLACK TOOL BAG
			ASSORTED WRENCHES	19	BLACK TOOL BAG
			ASSORTED SOCKET EXTENSIONS	18	BLACK TOOL BAG
			ASSORTED RATCHETS	4	BLACK TOOL BAG
			ASSORTED SOCKETS	2	BLACK TOOL BAG
			ASSORTED SOCKET ADAPTERS	3	BLACK TOOL BAG
			ORANGE HANDLED PLIERS	3	BLACK TOOL BAG
			ASSORTED PIENS	3	BLACK TOOL BAG
			ASSORTED SCREW DRIVERS	4	BLACK TOOL BAG
			EXTENDED MAGNET W/ SCREW DRIVER HANDLE		BLACK TOOL BAG
WORK PRO			METRIC SOCKET SET		BLACK TOOL BAG
USLE	48200		HEAVY DUTY SNAP RING PLIERS		BLACK TOOL BAG
PITTSBURGH	61707		1/2" DRIVE 10 PC DEEP IMPACT METRIC SOCKET SET		BLACK TOOL BAG
PITTSBURGH	69547		3/8" DRIVE 6PC HEX BIT SOCKET SET		BLACK TOOL BAG
PITTSBURGH	69546		3/8" DRIVE 6PC HEX BIT SOCKET SET		BLACK TOOL BAG
NIGHT STICK			ORANGE MAGNET LIGHT		BLACK TOOL BAG
PITTSBURGH	96363		1/2" DRIVE 7 PC SPLINE SOCKET SET		BLACK TOOL BAG
PITTSBURGH	96809		1/2" DRIVE 7 PC SPLINE SOCKET SET		BLACK TOOL BAG
PITTSBURGH	67897		3/8" DRIVE 9 PC BOLT EXTRACTOR SET		BLACK TOOL BAG
DOT BEST	346640		1/2" DRIVE 12 PC SOCKET SET		BLACK TOOL BAG
MILWAUKEE			DRIVE/DRILL ATTACHMENTS IN BOX		BLACK TOOL BAG
PITTSBURGH	67902		1/2" 13 PC IMPACT SOCKET SET		BLACK TOOL BAG
PITTSBURGH	62702		7 PC RUBBER STRAP WRINCH SET		BLACK TOOL BAG
WARRIOR	60475		6 PC WIRE WHEEL & CUP BRUSH SET		BLACK TOOL BAG
VOYAGER			20" ROLLAWAY TOOL BAG		BLACK TOOL BAG
KMP	W45505CB		SUPERLINE POLISHER W/ BAG		BLACK TOOL BAG
TROY-BILT	TB72	G00102038992	GAS TRIMMER		
PITTSBURGH	96645	1K195D01267	18 PC (17 COUNTED) OFFSET HANDLE HEX KEY SET		
BLACK & DECKER	FSD182		HHS STORM DRILL W/ BATTERY		
MILWAUKEE		C19A013430077	THE REMOMETER 12 VOLT LASER TEMP GUN		
AUTO CRAFT	ACB46-AHT		BLACK CHROME 48 PC SOCKET SET		
DEWALT	DW954	409423	14.4 VOLT DRILL W/ BATTERY		
BOSTITCH	SB1664FN		AIR NAIL GUN		
PITTSBURGH	61197	360271541	JACK STANDS	2	
RAFTSMAN	919.167311	2216288756	AIR COMPRESSOR W/ 2 HOSES		
KICKER			BOXES CONTAINING MTX AUTO SUBWOOFERS	2	
ELEMENT	ELEFW504		MAGNETIC PUSH BROOM		
PITTSBURGH	61253	K120122HS00011402	TV		
PITTSBURGH			RED HYDRAULIC MOTORCYCLE LIFT		
US GENERAL PRO	61427	373271550	3 TON FLOOR JACK		
PITTSBURGH	69781		HYDRAULIC TELESCOPIC TRANSMISSION JACK 1/2 TON		
CRESCENT	67913		5 DRAWER INDUSTRIAL ROLLER CART		SMALLER TOOL CHEST
PITTSBURGH	67911		1/2" NUT IMPACT SOCKET SET		SMALLER TOOL CHEST
PITTSBURGH	67908		RATCHET SET IN GRAY BOX		SMALLER TOOL CHEST
PITTSBURGH	67929		1/2" 7 PC IMPACT SWIVEL SOCKET SET		SMALLER TOOL CHEST
PITTSBURGH			1/2" 7 PC IMPACT SWIVEL SOCKET SET		SMALLER TOOL CHEST
PITTSBURGH			3/8" 7 PC IMPACT SWIVEL SOCKET SET		SMALLER TOOL CHEST
PITTSBURGH	97287		3/8" 7 PC IMPACT SWIVEL SOCKET SET		SMALLER TOOL CHEST
			1/2" 9 PC STAR POINT SOCKET SET		SMALLER TOOL CHEST

ATTACHMENT A

[illegible]

ATTACHMENT A

[illegible]

110 CORRECT	102	9 PC IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
110 CORRECT	101	9 PC IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	67911	1/2 DRIVE 7 PC IMPACT SWIVEL SETS	LARGE TOOLBOX RIGHT SIDE
JOB SMART	1036550	DEEP IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	96363	1/2 SPIRINT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
		BATTERY OPERATED WORK LIGHTS	LARGE TOOLBOX RIGHT SIDE
		4 PC 1/2 DEEP SPINDLE AXLE NUT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
CAL-HAWK	BSSAN4PA	ASSORTED AUTO DRAFT SOCKETS	LARGE TOOLBOX RIGHT SIDE
AUTOCRAFT		SOCKET ADAPTERS	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH		SWIVEL ADAPTER	LARGE TOOLBOX RIGHT SIDE
MAC TOOL		ASSORTED VICE GRIPS	LARGE TOOLBOX RIGHT SIDE
		CHAIN VICE GRIP	LARGE TOOLBOX RIGHT SIDE
		ASSORTED CHANNEL LOCKS	LARGE TOOLBOX RIGHT SIDE
STEELTON		NITFIDE NOSE PLIER	LARGE TOOLBOX RIGHT SIDE
SWISS TECH		ASSORTED RED HANDLED TOOLS	LARGE TOOLBOX RIGHT SIDE
JOB SMART		MULTI TOOL	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH		9 PC SCREW DRIVER SET	LARGE TOOLBOX RIGHT SIDE
RYOBI		ASSORTED SCREW DRIVERS	LARGE TOOLBOX RIGHT SIDE
		DRIVER BITS	LARGE TOOLBOX RIGHT SIDE
		ASSORTED SETS OF BITS	LARGE TOOLBOX RIGHT SIDE
		ASSORTED SCREW DRIVERS IN HOLDER	LARGE TOOLBOX RIGHT SIDE
AC PRO		GAUGE	LARGE TOOLBOX RIGHT SIDE
CENTRAL PNEUMATIC	350091525	TAP AND DIE SET IN RED CASE	LARGE TOOLBOX RIGHT SIDE
CENTRAL PNEUMATIC	3602745-2015	EARTHQUAKE AIR WRENCH	LARGE TOOLBOX RIGHT SIDE
		STRAIGHT LINE AIR SANDER	LARGE TOOLBOX RIGHT SIDE
CAL-HAWK	SR13F	IMPACT AIR TOOL	LARGE TOOLBOX RIGHT SIDE
	CAH170A	9 PC AIR HAMMER SET	LARGE TOOLBOX RIGHT SIDE
		AIR PALM SANDER METAL	LARGE TOOLBOX RIGHT SIDE
	360551518	PNEUMATIC DISC SANDER	LARGE TOOLBOX RIGHT SIDE
	H05005	PNEUMATIC WRATCHET NO 5/8	LARGE TOOLBOX RIGHT SIDE
		3 PC SOCKET ADAPTER SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH		MISC ASSORTED: SOAP, TAPE, TOOLS AND MISCELLANEOUS	LARGE TOOLBOX RIGHT SIDE
JOB SMART		18 PC HEX KEY SET	LARGE TOOLBOX RIGHT SIDE
PROJECT SOURCE		TAP MEASURE	LARGE TOOLBOX RIGHT SIDE
		FILE SET IN SLEEVE	LARGE TOOLBOX RIGHT SIDE
		12 PC NEEDLE FILES	LARGE TOOLBOX RIGHT SIDE
		1 HANDLE HEX KEY SET	LARGE TOOLBOX RIGHT SIDE
		ASSORTED ALLEN WRENCHES	LARGE TOOLBOX RIGHT SIDE
		ASSORTED FILES	LARGE TOOLBOX RIGHT SIDE
		4 PC PICK SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH		14 PC HEAVY DUTY PUNCH AND CHISEL SET IN SLEEVE	LARGE TOOLBOX RIGHT SIDE
CAL-HAWK		ASSORTED CHISELS	LARGE TOOLBOX RIGHT SIDE
		ASSORTED PUNCHES	LARGE TOOLBOX RIGHT SIDE
		ASSORTED PICKS	LARGE TOOLBOX RIGHT SIDE
		DRILL BITS	LARGE TOOLBOX RIGHT SIDE
		77 PC LETTER DIE SET	LARGE TOOLBOX RIGHT SIDE
		RAZOR BLADE 100 CT	LARGE TOOLBOX RIGHT SIDE
		9 PC IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
		3" BRUSH ATTACH	LARGE TOOLBOX RIGHT SIDE
SURE BUILT	AC356	4" STAINLESS STINGER WHEEL	LARGE TOOLBOX RIGHT SIDE
AUTOCRAFT		NIT IN WOOD BOX 13 PC	LARGE TOOLBOX RIGHT SIDE
DEWALT		GLOVES	LARGE TOOLBOX RIGHT SIDE
DEWALT		ASSORTED GRINDER DISCS	LARGE TOOLBOX RIGHT SIDE
XACTO KNIFE		DISC GRINDER (90-111) W/ GUARD AND TOOL	LARGE TOOLBOX RIGHT SIDE
		GRINDER TOOL (90-111) W/ DISC WRENCH NO 5/8	LARGE TOOLBOX RIGHT SIDE
PORTER CABLE		8 PC 3/8 DEEP IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
DEWALT		8 PC 3/8 DEEP IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	67920	7 PC 3/8 SWIVEL IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	67929	2 PC 3/8 SWIVEL IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	67908	9 PC UNIVERSAL SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	7337620	9 PC UNIVERSAL SOCKET SET	LARGE TOOLBOX RIGHT SIDE
KOBALT	7337621	9 PC UNIVERSAL SOCKET SET	LARGE TOOLBOX RIGHT SIDE
KOBALT	338531	3/8 11 PC IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
KOBALT	338530	3/8 8 PC IMPACT SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	61345	1/4 10 PC CHROME DEEP WALL SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	61343	1/4 10 PC CHROME DEEP WALL SOCKET SET	LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	50810	3/8 7 PC SPINE SOCKET SET	LARGE TOOLBOX RIGHT SIDE
GEAR WRENCH		20 PC SOCKET/WATCH SET	LARGE TOOLBOX RIGHT SIDE

ATTACHMENT A

GEAR WRENCH	44005	FLEX HEAD RATCHETING/WRENCH 7 PC SET			
PITTSBURGH	67885	ASSORTED WRENCHES	5		BOTTOM TOOLBOX
US11E	20250	COMPRESSION TEST KIT			BOTTOM TOOLBOX
		COMPRESSION TESTER	3		BOTTOM TOOLBOX
AUTODRAFT	AC525	ASSORTED COMPRESSION FLNR			BOTTOM TOOLBOX
CALVAN	101	5 PC STEERING PUMP PULLEY KIT			BOTTOM TOOLBOX
POWER BUILT		AUTO INHIRE FLARE TOOL			BOTTOM TOOLBOX
		SCREW KIT			BOTTOM TOOLBOX
		6 PC PLASTIC FITTING SET	6		BOTTOM TOOLBOX
		MISC TOOLS			BOTTOM TOOLBOX
AUTODRAFT	AC580	HARMON BALANCE PULLER SET			BOTTOM TOOLBOX
AUTODRAFT	AC509	TIMING GEAR RULER			BOTTOM TOOLBOX
AUTODRAFT	AC578	3 PC STEERING LOCK PLATE REMOVER			BOTTOM TOOLBOX
OEM	27019	HARMONIC BALANCE PULLER KIT	15		BOTTOM TOOLBOX
		ASSORTED CLAMPS	2		BOTTOM TOOLBOX
		ASSORTED PULLERS	20		LEFT SIDE TOOLBOX
		ASSORTED CUTTING HAND TOOLS			LEFT SIDE TOOLBOX
PITTSBURGH	95837	4 PC AUTODRAFT TILER SET			LEFT SIDE TOOLBOX
PRO STAR		TIP CLEANER TOOL			LEFT SIDE TOOLBOX
		ASSORTED SCRAPES	4		LEFT SIDE TOOLBOX
		ASSORTED WIRE BRUSHES	5		LEFT SIDE TOOLBOX
		TORCH NOZZLE			LEFT SIDE TOOLBOX
		SPARK PLUG GRABBER			LEFT SIDE TOOLBOX
		SHIM MEASURES	2		LEFT SIDE TOOLBOX
		T-HANDLE			LEFT SIDE TOOLBOX
		WORKZONE DIGITAL CALIBER			LEFT SIDE TOOLBOX
PITTSBURGH	67090	ASSORTED CRESCENT WRENCHES	11		LEFT SIDE TOOLBOX
PITTSBURGH	67089	7 PC LONG REACH HEX BIT SET			LEFT SIDE TOOLBOX
PITTSBURGH	61335	7 PC LONG REACH HEX BIT SET			LEFT SIDE TOOLBOX
PITTSBURGH	61337	1/2 B PC IMPACT HEX DRIVE SET			LEFT SIDE TOOLBOX
PITTSBURGH	61336	1/2 B PC IMPACT HEX DRIVE SET			LEFT SIDE TOOLBOX
JOB SMART	1038285	1/2 B PC IMPACT STAR SOCKET SET			LEFT SIDE TOOLBOX
GEAR WRENCH		6 PC STAR BIT SOCKET SET			LEFT SIDE TOOLBOX
MECH POWER		10 PC STAR BIT SOCKET SET			LEFT SIDE TOOLBOX
		DRILL BIT SET (most missing) ORANGE CASE			LEFT SIDE TOOLBOX
		ASSORTED VOLT TESTERS	5		LEFT SIDE TOOLBOX
CENTICH	90839	7 FUNCTION DIGITAL MULTIMETER			LEFT SIDE TOOLBOX
AUTODRAFT	AC390	ASSORTED HAMMERS	17		LEFT SIDE TOOLBOX
CHICAGO ELECTRIC		7 PC BEARING RACE AND SEAL DRIVERS SET			LEFT SIDE TOOLBOX
ATET		18 V DRILL			LEFT SIDE TOOLBOX
	368361517	FLIP PHONE BLUE/BLACK			LEFT SIDE TOOLBOX

ATTACHMENT A

Section 1952, or a conspiracy to violate such offense, including, but not limited to, \$2,241.00 in United States Currency and miscellaneous tools described in Attachment A, seized on June 23, 2016.

3. Pursuant to Title 18, United States Code, Section 982(a)(1) and Title 18, United States Code, Section 1956, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property, real or personal, involved in such offense, and any property traceable to such property, including, but not limited to: (1) all funds contained in Bank of America account number XXXXXXXX0983, held in the name of Tiara Adams; (2) all funds contained in Wells Fargo account number XXXXXX7241, held in the name of Empire Estates, LLC; (3) all funds contained in PNC Bank account number XXXXXX4194, held in the name of Tiara Adams; and (4) a money judgment in the amount of at least \$300,000.

4. Pursuant to Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c), the government will seek forfeiture of substitute property up to the value of property subject to direct forfeiture that is not available for forfeiture on account of any act or omission contemplated by Title 21, United States Code, Section 853(p)(1).

A True Bill,

/s/ _____
Grand Jury Foreperson

/s/ _____
William J. Ihlenfeld, II
United States Attorney

Anna Z. Krasinski, Assistant United States Attorney
Stephanie S. Taylor, Special Assistant United States Attorney